



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

NJD000729699

INSTALLATION ADDRESS

**FORD MOTOR COMPANY NEW YORK PARTS D C
US HIGHWAY 46
TETERBORO NJ 07608**

**US HIGHWAY 46
TETERBORO NJ 07608**

PAS
AUG 31 1 59 PM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007



Lina

REQ
T.T.

Ford Motor Company
Ford Parts and Service Division
New York Parts Distribution Center

U.S. Highway 46
Teterboro, New Jersey 07608

Delete TSP.

Amend
11/3

April 13, 1981

U. S. Environmental Protection Agency
Region V
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

sub-notification

Subject: Modification of Notification of Hazardous Waste Activity
Ford Parts and Service Division - New York Parts Distribution Center
U.S. EPA Facility ID No. NJD 000-729-699

Reference: 45FR 76635, Nov. 19/1980 PAR VI

On August 18, 1980, the above referenced Ford Motor Company facility submitted a Notification of Hazardous Waste Activity to EPA Region V as a hazardous waste generator, in response to regulations promulgated under the Resource Conservation and Recovery Act (RCRA).

Since the Notification was filed, we have further evaluated operations conducted at the facility and have revisited applicable regulations and subsequent amendments. We now conclude that the facility should be categorized only as a "Generator" of hazardous waste in accordance with provisions of Section 262.34 of the regulations. Because no hazardous waste treatment/storage/disposal activities are conducted at this facility, it has been determined that no RCRA permit application is required.

We would therefore like to modify our Notification of Hazardous Waste Activity and request that EPA update its records to reflect that this facility does not conduct hazardous waste treatment/storage/disposal activities.

Very truly yours,

J.P. McGowan

J. P. McGowan, Manager
New York Parts Distribution Center

APR 16 1981

/sv

IRREG. SUB. NOT.

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER
F NID000729699 21
APPROVED
DATE RECEIVED (yr., mo., & day)
800818

I. NAME OF INSTALLATION

FORD MOTOR COMPANY NEW YORK PARTS D C

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

US HIGHWAY 46

CITY OR TOWN

ST.

ZIP CODE

TETERBORO NJ 07608

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

US HIGHWAY 46

CITY OR TOWN

ST.

ZIP CODE

TETERBORO NJ 07608

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

CROOKARD F M WHSE OPNS MGR 201-288-9400

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

FORD MOTOR COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

J. P. Mc GOWAN, MANAGER
NEW YORK PDS, FORD MOTOR CO

Aug 11, 1980



AI 2-3-83
AI

F. M. Rookard

Warehouse Operations Manager
New York Distribution Center
Ford Parts Division
Ford Marketing Corporation

U.S. Highway 46
Teterboro, New Jersey 07608
Telephone: 201/288-9400

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☐

HWM (TSD) facility ☒

Copy of report sent to the facility ☐

1

Facility Information

Name: Ford Motor Company New York Parts Distribution Center

Address: us Highway 46 (west side)
Feterboro Teterboro

County: Bergen

EPA ID#: NJ0000729699

Date of Inspection: 2-3-83, Thursday

Participating Personnel

State or EPA Personnel: A. Iannuzzi Jr.

Facility Personnel: 1) F.M. Rookard, Warehouse Operations Manager
2) Frank Malloy, Maintenance Supervisor
3) Eli Tirozzi, chief of security

Report Prepared by Name: Alphonse Iannuzzi Jr.

Agency: N.J. DEP

Telephone #: 201-648-3669

Approved for the Director by: _____

MAR 9 2 29 PM '83
PERMITS ADMIN. BRANCH
REGION II
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

Handed in to
Wayne
Mon 2/28/83
SC

2/28/83
AF

Comments, observations, summaryRecommendations

accepting waste without a manifest.

I am recommending that the violations noted below be processed.

The following violations were noted:

262.11 - never tested its waste (but they are disposing all waste as haz. waste).

262.21 - manifest missing info. (2)

262.40 - no except report, wst. analysis

262.42 - no receipt for 1 manifest

262.34 - no accum. dates, unlabeled containers

265.13 - no wst. analysis

265.14 - no danger signs

265.15 - no inspect. schedule

265.16 - no job titles -

265-D - plan ^{given} not to local auth., no list of emergency eqt.

265.73 - no op. record.

265.112 - no clause plan

265-I - no containment system

265.171 - cont. in poor condition.

265.173(a) - 1 open container

265.173(b) - leaking containers

265.176 - ignitable waste < 50' if paint is ignitable (it was never tested).

Fmc. wrote a letter to EPA 10-80-81 asking to remove its TSD status, however, they did not have anything from EPA acknowledging the removal of this status. The TSD Check list was completed for this site.

Signature of Inspector

Signature of Facility Representative

Summary of Findings

Facility Description and Operations

Ford Motor Company (FMC) operates a parts warehouse for automotive parts at this facility. They are considered an automotive replacement parts distribution center. FMC operates a very large warehouse at this facility.

FMC was listed as a GEN. and TSDI in the DWM's computer read-out. Mr. Rookard stated that FMC is not a TSDI.

They wrote a letter to EPA Region II asking to have their TSDI status removed dated 10-22-81 (see attached copy of this letter).

FMC never received notice from EPA that their TSDI status has been removed. GEN and TSDI checklists were completed for this facility.

WASTES:

Wastes produced at this facility include the following:

1) The following materials are disposed as hazardous waste due to being discontinued by Ford or having their expiration dates exceeded; paints in aerosol cans and quarts, degreasers, thinners (Ford has stopped distributing this), undercoatings, rear end oil, etc. Transmission fluid and motor oil used to be inventoried at this site, however FMC does not presently stock this material.

2) Waste motor oil from changing their own fleet oil (according to Mr. Rookard and Malloy). However, Mr. Tirozzi stated that FMC's cars (fleet) are serviced at Ford dealerships. Mr. Rookard stated that about 100 gals/yr of this oil is produced at maximum.

Comments, observations, summary3) Waste hydraulic fluid (oil) from servicing fork lifts.

Mr. Rookard stated that FMC started their scrap program in 1979. Ford's head quarters in Detroit, Michigan tells FMC which products have to be ~~taken out of inventory~~ to be disposed. He stated that FMC is always generating waste, every other week. He said that the waste generated varies, but is around 30-40 drums per year. This statement is not consistent with a letter statement made by Mr. Rookard that FMC only takes materials out of inventory when Detroit tells them to. FMC buys back its products from Ford or Lincoln-^{FMC}mercury vendors when they go out of business. Also taken back defective material from its customers. FMC determines if this material is defective or if it could be ~~resold~~ or disposed. Shipping documents are not used to document FMC receiving this material. Mr. Rookard stated that the material received has to be in "new first class saleable condition".

Manifest Check:

Review of FMC's manifest records indicated that FMC used to dispose of its waste at Duane marine 26 Washington St. Perth Amboy, N.J. prior to 1980. FMC presently uses S.W. Waste S. Kearny, N.J. to dispose of its waste.

The following manifested ~~shipments~~ shipments were made since Nov. 1980.

- 1) 6/7/82 - NJ0095824 - 72 drums to S.W.
- 2) 6/8/82 - NJ0095838 - 79 drums to S.W.
- 3) 7/27/82 - NJ0126787 - 34 drums to S.W.
- 4) 10/19/82 - NJ0134381 - 24 drums to S.W.

No shipments were made ~~for~~ 1981. Mr. Rookard

A.I.J.

Signature of Inspector

Signature of Facility Representative

Comments, observations, summary

A-3

stated that this was due to the economic problems of Ford during this time (Ford didn't want to put out money for waste disposal). Mr. Rookard stated that all of the materials were maintained in inventory rather than being taken out of inventory for disposal during this time (1980).

Fmc occasionally gives paint and other products intended for disposal to vocational schools for their use. However, Mr. Rookard stated that Fmc likes to protect its products from being used in the after market, and therefore dispose of the discontinued and expired products.

Copies of two manifests with discrepancies (i.e. no units, container type, or EPA waste type), NJ00095824 and NJ00095838 are attached. Fmc did not receive the part B copy of the manifest for NJ0134381 (10/19/82). An exception report was not completed for this problem. The attached checklist documents these problems further.

Mr. Rookard stated that the waste presently on site has been accumulated since an inventory clean out at the end of the year not since the last shipment on 10/19/82. This could ~~be the~~ ^{be} determined since the drums in storage did not have accumulation dates on them and Fmc did not have a waste drum inventory record.

Mr. Rookard stated that Fmc no longer has 55 gal drums of transmission fluid ^(bulk) on site and they were all removed during the 10/19/82 waste shipment.

NEJ
Signature of Inspector

Signature of Facility Representative

Comments, observations, summary

A-4

Facility Inspection

The facility was inspected with Mr. Frazzini and Mr. Malloy. I took a brief tour of FMC's warehouse. There were no problems noted in this building and the housekeeping was very good.

The hazardous waste storage area, which is located outside of the warehouse (east side), was inspected. This area is in a fenced section of FMC's parking lot.

Fifteen drums were noted in storage during the inspection.

These drums were noted as follows:

3 metal 55 gallon drums ^{on the same pallet} with haz. waste labels indicating that the material was Trans fluid. Each drum had the following information missing from its label; accumulation date, EPA ID #, and waste type.

2 metal 55 gallon drums on the same pallet with hazardous waste labels indicating the material to be paint and paint aerosol. The labels were missing the following information; accumulation date ^{and} EPA waste type.

3 fifteen gallon drums were on the same pallet with hazardous waste labels indicating the material to be undercoating. All three of these drums were leaking. The spillage was on the pallets and on the asphalt. The material was a thick black sludge. The labels were missing the following information; UN#, EPA ID#, accumulation date ^{and} EPA waste type ^{and} manifest #.

4 fifteen gallon ^{black} fiber pack drums with haz. waste labels indicating the material to be Lubricant (which Mr. Malloy

ATJr
Signature of Inspector

Signature of Facility Representative

Comments, observations, summary

said was car chassis lube). One of these drums were punctured and another was dented (neither were leaking).

1 five gallon unlabeled drum. Mr. Malloy stated that this drum contained paint stripper which was used for removing paint from the floor. He said that FMC will label this drum.

2 drums (approx. 35 gal. each) with haz. waste labels indicating that they contained power steering fluid and paint waste were on the same pallet. One of these drums ~~was~~ did not contain a top. Both of these drums did not contain accumulation dates.

There were some rusted drums stored in NW section of the fenced in area. ~~of these drums~~ were in a separate area from the waste drums. A 15 gallon metal drum in poor condition which had its label weathered which ~~was~~ leaking was noted in this area. Mr. Malloy stated that this drum contained undercoating. Four 5 gal. drums labeled automotive engine exterior and engine compartment reconditioning cleaner ^{that} were severely rusted, were in this area. Approximately 3 fifty five gallon drums labeled as containing thinner were in this area. After pouring some of the material out of each drum it was determined that these drums contained rain water. ~~Some~~ Some of the water had slight solvent odors. All of the drums were partially full (approx. 1/3 full). All of the drums in this area were considered to be in inventory, ^{they} were not considered waste.

There were several empty 55 gallon ^{metal} drums stored near the haz. waste drums (approx. 25). All of these drums

AIJN
Signature of Inspector

Signature of Facility Representative

EPA ID NO. NJ0000729699

HW/EF NO.

A-6

Comments, observations, summary

had open tops and about one inch of blue sludge in them. Rain water had accumulated in each of these drums.

A full 55 gallon drum of waste hydraulic oil and a partially full drum of this oil was noted next to the maintenance shop. Both of these drums were unlabeled.

Actions to be taken by FMC

Mr. Malloy stated that FMC will repackage all leaking drums and consolidate all of the drums containing contaminated water for disposal as hazardous waste. The leaking drums will be repacked today (2-27-83).

Samples/Photos

No samples or photos were taken.

cc

Duane Marine file, DWM Region II

AIEJn

Signature of Inspector

Signature of Facility Representative

Describe the activities that result in the generation of hazardous waste.

- 1) expired or discontinued automotive replacement parts that are taken out of inventory for disposal (oils, paint, etc.)
- 2) waste hydraulic oil from equipment servicing (fork lifts)
- 3) waste oil from servicing FMC's fleet.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

- 3 drums 55 gal. - Trans fluid.
- 2 drums 55 gal. - paint & aerosol paint.
- 3 drums 15 gal. - undercoating
- 4 drums 15 gal. - lubricant (car chassis lube).
- 1 drum 5 gal - paint stripper
- 2 drums 35 gal - power steering fluid.
- 1 1/2 drums 55 gal - waste hydraulic fluid.

I'm not sure if there are waste { 1 drum 55 gal - undercoating
4 drums 5 gal - automotive reconditioning cleaners

Is there reason to believe that the facility has hazardous waste on-site?

a. If yes, what leads you to believe it is hazardous waste?

Check appropriate boxes:

- ☒ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

YES NO N/A

262.11 - Hazardous waste determination

- 1) Did the generator test its waste to determine whether it is hazardous?

Is the waste hazardous?

- 2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

4 shipments all in 1982

NJ0134381 24 drums
NJ0130787 39 drums
NJ00095824 72 drums

dry
NJ0095838 79A

- 262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. Number?
- the transporters name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

- 262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

No except. report.

- 262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?

NJ0134381 (10/19/82)

no receipt for

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

manifests
NJ0095824 (6/7/82)
and NJ0095838 (6/8/82)
did not have
container type or
EPA HAZ. Code or
EPA waste type.
(see copies)

YES NO N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) ☒ ☐ ☐
- 2) Label each package according to DOT (i.e., 49 CFR 172) ☒ ☐ ☐
- 3) Mark each package according to DOT (i.e., 49 CFR 172) ☒ ☐ ☐
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) ☒ ☐ ☐

How many drums in storage did not comply with all these requirements.

262.34 Accumulation Time

1) How is waste accumulated on-site?

☒ Containers

☐ Tanks

☐ Surface impoundments (complete EWMF checklist)

☐ Piles (complete EWMF checklist)

2) Is waste accumulated for more than 90 days?

If yes, complete EWMF checklist

* Mr. Rookard said not since Nov. 1980

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?

☒ ☐ ☐

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?

☒ ☐ ☐

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

YES NO N/A

40 CFR Part 265 Subpart B General Facility Standards

265.13-General Waste Analysis

- 1) Is there a detailed chemical and physical analysis of a representative sample of the waste or each waste?
(At a minimum this analysis must contain all the information necessary for proper management of the waste)
- 2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?
You may check only one

Waste characteristics vary _____

All waste are basically the same _____

Company treats all waste as hazardous _____

including undercoating and anti-freeze.

- 3) Is there a written waste analysis plan at the facility?

Does it contain the following:

- a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.
- b) Test methods used to test these parameters.
- c) Sampling methods to obtain a representative sample of the waste to be analyzed.
- d) Frequency of repeated analysis to ensure accurate and current information.
- 4) Does hazardous waste come to this facility from an outside source? e.g. another generator. *I'm not sure see comment*
- 5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?

265.14-Security

- 1) Is there: a) a 24-hour surveillance system? or,
b) a suitable barrier which completely surrounds the active portion of this facility?
- 2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

If no, explain what measures are taken for security.

265.15 - General Inspections Requirements

- 1) Does the facility have a written inspection schedule?
- 2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?
- 3) Does the owner/operator record inspections in a log?
- 4) Is there evidence that problems reported in the inspection log have been remedied?

If no, please explain.

however, some materials are returned to Ford for either resale or disposal i.e. if a Ford Center goes out of business the material is returned to Ford & they have disposed of this material when there is no market for it. This material is not documented with a shipping document or manifest.

265.16 - Personnel Training

YES NO N/A

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

☒ ☐ ☐

If yes, have facility personnel taken part in an annual review of training?

☒ ☐ ☐

- 2) Is there written documentation of the following:

—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

☐ ☒ ☐

—type and amount of training to be given to personnel in jobs related to hazardous waste management?

☒ ☐ ☐

for haz. materials

—actual training or experience received by personnel?

☒ ☐ ☐

- 3) Are training records kept on all employees for at least 3 years?

☒ ☐ ☐

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

- 1) Are there ignitable, reactive or incompatible waste on site?

☐ ☒ ☐

If yes, what are the approximate types and quantities and location of the waste.

Mr. Rookard stated that he is not sure if the waste paint is ignitable. This answer may be yes, Ford has not tested the waste paint.

- 2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?

☒ ☐ ☐

If no, please explain. no smoking signs are posted in drum storage area.

- 3) In your opinion, are proper precautions taken so that these wastes do not:

— generate extreme heat or pressure, fire or explosion, or violent reaction?

☒ ☐ ☐

— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?

☒ ☐ ☐

— damage the structural integrity of the device or facility containing the waste?

☒ ☐ ☐

— threaten human health or the environment?

☒ ☐ ☐

40 CFR 265 - Subpart C - Preparedness and Prevention

YES NO N/A

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

- an internal communications or alarm system?
- a telephone or other device to summon emergency assistance from local authorities?
- portable fire equipment?
- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

✓ — —
✓ — —
✓ — —
✓ — —

265.33 Is equipment tested and maintained?

✓ — —

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

✓ — —

265.35 Adequate aisle space?

✓ — —

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

all procedures are required

✓ — —

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

✓ — —

1) Does the plan describe arrangements made with the local authorities?

✓ — —

2) Has the contingency plan been submitted to the local authorities?

— ✓ —

3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?

✓ — —

4) Does the plan have a list of what emergency equipment is available?

— ✓ —

5) Is there a provision for evacuating facility personnel?

✓ — —

6) Was there an emergency coordinator present or on call at the time of the inspection?

✓ — —

have fire brigade training, + spec plan.

have automatic response by #PT with Hasbrouck Heights Fire Dept.

but there are ~~materials~~ papers posted in warehouse where this material is available. all safety eqpt. is posted throughout the warehouse.

Contingency Plan is not in one central place.

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?

If no, skip to 265.73 - Operating Record

(I'm not sure if returned products are considered waste)

2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?

— — ✓

If not, please explain.

YES NO N/A

3) How many post-November 19 manifests does the facility have?
(Estimate if the number is large) 4

4) Does each manifest have the following information?
(circle missing information)

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. #?
- the transporters name and EPA I.D. Number?
- the TSD name, address, telephone number & EPA I.D. Number?
- a description of the waste (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

(Obtain a copy of the incomplete manifests)

See gen. section manifest section facility only has manifests for gen. waste

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?

Co. claims that it does not

Describe unreconciled discrepancies.

receive haz. waste from off site source

265.73 - Operating Record

1) Does the facility keep an operating record? ✓

2) Does the record contain the following information:

- a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?
- b) The location and quantity of each hazardous waste at each location?
- c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?
- d) Summary reports and details of all incidents that require implementing the contingency plan. never had to implement plan
- e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?
- f) Monitoring, testing or analytical data where required for:

Groundwater, Land Treatment, Incinerators, and Thermal Treatment?

N/A

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?

I'm not sure

If yes, has the facility submitted an unmanifested waste report?

 ✓

40 CFR 265 Subpart F - Groundwater Monitoring

YES NO N/A

(Applies only to surface impoundments, landfills and/or land treatment facilities.)

Is a groundwater monitoring plan available at the facility? ✓

If yes, please fill out the appropriate Groundwater Monitoring Questionnaire and attach to this report.

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980? ✓

If yes, please explain

265.112 - Closure Plan

Does the facility have a written closure plan? ✓
(Applies to all types of TSD facilities)

If yes, does the written plan include:

1. A description of how and when the facility will be partially (if applicable) and ultimately closed?
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?
3. A description of the steps necessary to decontaminate facility equipment during closure?
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?
5. Does the owner/operator have a written estimate of the cost of closing the facility?

If yes, what is it? (\$)

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? ✓
(Applies only to disposal facilities)

If yes, Does the Plan:

1. Identify the activities which will be carried on after closure and the frequency of these activities?
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?
4. Include the name, address and phone number of a person or office to contact during post-closure?
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?

If yes, what is it? (\$)

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
Container - pg 6	Tank - pg 7	Landfill - pg 11
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other _____
Waste Piles - pg 9	Land Treatment - pg 10	
Other _____	Chemical, Physical and Biological Treatment - pg 13	
	Other _____	

YES NO N/A

40 CFR 265 - Subpart I - Containers

- 1) - What type of containers are used for storage.
Describe the size, type, quantity and nature of waste
(e.g. 12 fifty-five gallon drums of waste acetone)

13. fifty five gallon drums of haz. waste are on site according to Mr. Rookard.
(See comments section)

- 2) - Is there a containment system for spills, leaks and precipitation?

If yes, describe.

___ ☒ ___

- 265.171 - Do the containers appear to be in good condition, not in danger of leaking?

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

4 leaking containers, one punctured and one dented.

___ ☒ ___

- 265.172 - Are hazardous waste stored in containers made of compatible materials?

If not, please explain.

___ ☒ ___

- 265.173(a) - Are all containers closed except those in use?

___ ☒ ___ one was open.

- 265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

___ ☒ ___

- 265.174 - Is the storage area inspected at least weekly?

___ ☒ ___ according to Mr. Rookard.

- 265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?

___ ☒ ___

- 265.177 - Are incompatible wastes stored separate from each other?

___ ☒ ___

If no, explain

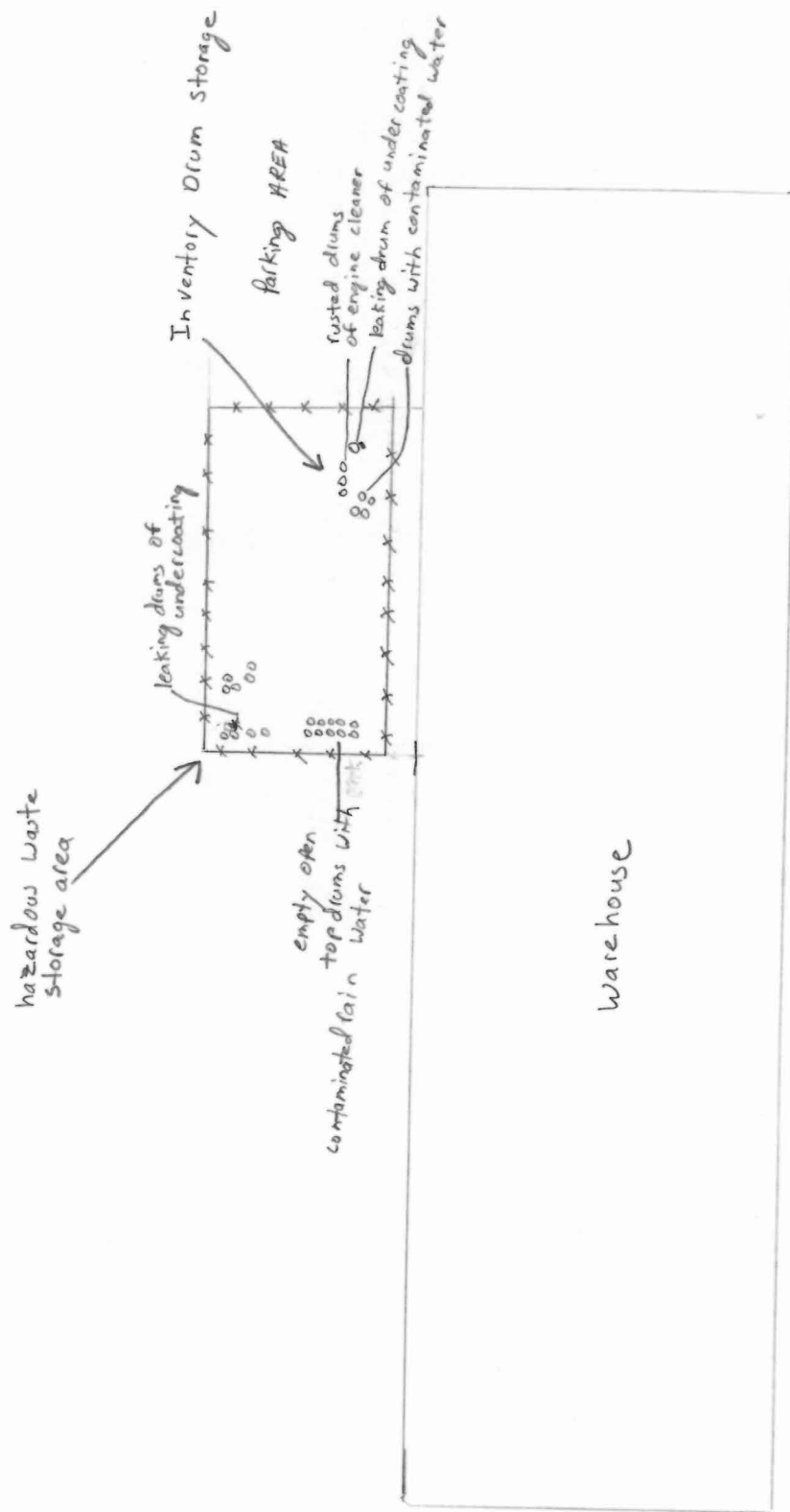
FORD MOTOR COMPANY

Teterboro, NJ. 2-3-83

A. Iannuzzi Jr.

Not to scale

ROUTE 46





Ford Parts and Service Division
Ford Motor Company

New York Parts Distribution Center
U.S. Highway 46
Teterboro, New Jersey 07608

October 22, 1981

U. S. Environmental Protection Agency
Region II
RCRA Activities
26 Federal Plaza
New York, New York 90007

Gentlemen:

Subject: Modification of Notification of Hazardous Waste Activity
New York Parts Distribution Center
U. S. EPA Facility ID No. NJD-000729699

Reference: 45 FR 76635, Nov. 19-1980 Par VI

On August 18, 1980, the above-referenced Ford Motor Company facility submitted a Notification of Hazardous Waste Activity to EPA Region II as a hazardous waste generator, in response to regulations promulgated under the Resource Conservation and Recovery Act (RCRA).

Since the Notification was filed, we have further evaluated operations conducted at the facility and have revisited applicable regulations and subsequent amendments. We now conclude that the facility should be categorized only as a "Generator" of hazardous waste in accordance with provisions of Section 262.34 of the regulations. Because no hazardous waste treatment/storage/disposal activities are conducted at this facility, it has been determined that no RCRA permit application is required.

We would, therefore, like to modify our Notification of Hazardous Waste Activity and request that EPA update its records to reflect that this facility does not conduct hazardous waste treatment/storage/disposal activities.

Very truly yours,

R. L. Hoffman
Parts Distribution Center Manager

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Ref 2-3-83

Use TYPE 211 information.

HAZARDOUS WASTE MANIFEST

DOCUMENT NO. NJ 0095824

PART A: GENERATOR'S COPY

GENERATOR NAME FORD MOTOR COMPANY		PHONE (INCLUDE AREA CODE) 201-288-9400	EPA ID NO. N J D 0 0 0 7 2 9 6 9 9
ADDRESS (STREET - CITY - STATE - ZIP CODE) U.S. HIGHWAY # 46, TETERBORO, NJ			
TRANSPORTER NO. 1 S. & W. WASTE, INC.		PHONE (INCLUDE AREA CODE) 201-344-4004	EPA ID NO. N J D 0 9 6 8 6 5 8 3 7
ADDRESS (STREET - CITY - STATE - ZIP CODE) 53 PENNSYLVANIA AVENUE, SOUTH KEARNY, NJ 07032			
TRANSPORTER NO. 2		PHONE (INCLUDE AREA CODE)	EPA ID NO.
ADDRESS (STREET - CITY - STATE - ZIP CODE)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY S. & W. WASTE, INC.		PHONE (INCLUDE AREA CODE) 201-344-4004	EPA ID NO. N J D 0 9 6 8 6 5 8 3 7
SITE ADDRESS (STREET - CITY - STATE - ZIP CODE) 53 PENNSYLVANIA AVENUE, SOUTH KEARNY, NJ 07032			

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. _____ OF A TOTAL OF _____. THE FIRST MANIFEST DOCUMENT NO. IS NJ → _____

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS		EPA HAZ CODE	EPA WASTE TYPE
						NO.	TYPE		
1. WASTE OIL, NOS	COMBUSTIBLE	1270	1	1980	1	34	01	T	X7216
2. WASTE PAINT, NOS	ORM - D	1263	1	935	1	17	01	T	D008
3. WASTE ANTIFREEZE	ORM - D	9189		660		12			
4. WASTE UNDERCOATING	ORM - D	9189		35		7			
5.									
6.									

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE ALSO PRINT SIGNATURE <i>F. M. ROCKARD</i> F. M. ROCKARD	TITLE WASTE OPS MGR	DATE SHIPPED MO. 06 DAY 07 YR. 82	EXPECTED ARRIVAL DATE MO. 06 DAY 07 YR. 82
TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE <i>Paul DuBois</i> PAUL DUBOIS	TRANSPORTER NO. 1 SWA REGISTRATION NO. NJIS WAS 300264	DATE RECEIVED MO. 06 DAY 07 YR. 82	

TEAR AT THIS SEPARATION

TEAR AT THIS SEPARATION

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Re: 2-3-83

Please type all information.

HAZARDOUS WASTE MANIFEST

PART A: GENERATOR'S COPY

DOCUMENT NO. NJ 0095838

GENERATOR NAME FORD MOTOR COMPANY	PHONE (INCLUDE AREA CODE) 201-288-9400	EPA ID NO. N J D 0 0 0 7 2 9 6 9 9
ADDRESS (STREET - CITY - STATE - ZIP CODE) U.S. HIGHWAY 46, TETERBORO, NEW JERSEY 07608		
TRANSPORTER NO. 1 S & W WASTE, INC.	PHONE (INCLUDE AREA CODE) 201-344-4004	EPA ID NO. N U D 0 9 6 8 6 5 8 3 1 7
ADDRESS (STREET - CITY - STATE - ZIP CODE) 53 PENNSYLVANIA AVENUE, SO. KEARNY, N.J. 07032		
TRANSPORTER NO. 2	PHONE (INCLUDE AREA CODE)	EPA ID NO.
ADDRESS (STREET - CITY - STATE - ZIP CODE)		
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY S & W WASTE, INC.	PHONE (INCLUDE AREA CODE) 201-344-4004	EPA ID NO. N U D 0 9 6 8 6 5 8 3 1 7
SITE ADDRESS (STREET - CITY - STATE - ZIP CODE) 53 PENNSYLVANIA AVENUE, SO. KEARNY, NEW JERSEY 07032		

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. _____ OF A TOTAL OF _____. THE FIRST MANIFEST DOCUMENT NO. IS NJ → _____

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS		EPA HAZ CODE	EPA WASTE TYPE
						NO.	TYPE		
1. Waste Oil, n.o.s.	Combustible	1270	1	550	1	10	01	T	X7216
2. Waste Paint, n.o.s.	ORM-D	1263	1	1540	1	28	01	T	D0018
3. WASTE UNDERCOATING	ORM-D	9189		1025		41			
4.									
5.									
6.									

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE <i>F.M. ROOKARD</i> F.M. ROOKARD	TITLE Waste Manager	DATE SHIPPED 06 08 82 MO. DAY YR.	EXPECTED ARRIVAL DATE 06 08 82 MO. DAY YR.
TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE <i>Paul D. ...</i>	TRANSPORTER NO. 1 SWA REGISTRATION NO. N U S W A S 3 0 0 2 B U	DATE RECEIVED 06 08 82 MO. DAY YR.	

TEAR AT THIS DELINEATION

PERMITS BRANCH
REGION II
OCT 29 2 23 PM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007



Ford Parts and Service Division
Ford Motor Company

New York Parts Distribution Center
U.S. Highway 46
Teterboro, New Jersey 07608

October 22, 1981

U. S. Environmental Protection Agency
Region II
RCRA Activities
26 Federal Plaza
New York, New York 90007

Gentlemen:

Subject: Modification of Notification of Hazardous Waste Activity
New York Parts Distribution Center
U. S. EPA Facility ID No. NJD-000729699

Reference: 45 FR 76635, Nov. 19-1980 Par VI

On August 18, 1980, the above-referenced Ford Motor Company facility submitted a Notification of Hazardous Waste Activity to EPA Region II as a hazardous waste generator, in response to regulations promulgated under the Resource Conservation and Recovery Act (RCRA).

Since the Notification was filed, we have further evaluated operations conducted at the facility and have revisited applicable regulations and subsequent amendments. We now conclude that the facility should be categorized only as a "Generator" of hazardous waste in accordance with provisions of Section 262.34 of the regulations. Because no hazardous waste treatment/storage/disposal activities are conducted at this facility, it has been determined that no RCRA permit application is required.

We would, therefore, like to modify our Notification of Hazardous Waste Activity and request that EPA update its records to reflect that this facility does not conduct hazardous waste treatment/storage/disposal activities.

Very truly yours,

R. L. Hoffman

R. L. Hoffman
Parts Distribution Center Manager

*del TSD
add gen*

*GH
HWOM 5
3/15/83*

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: January 4, 2016 - 12:41 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD000729699	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 01/04/2016		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:4 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: January 4, 2016 - 12:41 PM

Page 2

FORD MOTOR CO NEW YORK PARTS D C

County Name / Code: BERGEN / NJ003

NJD000729699

Location: US HWY 46; TETERBORO, NJ 07608

REGION 02

Mailing: 280 PROSPECT PLAINS ROAD; CRANBURY, NJ 08512

Activity Location: NJ	State District: NORTHERN	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: N
Generator: N	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ---	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation: Activity Location: NJ	Type: 262.A	Determined Date: 07/06/1984	Determined by Agency: State	Responsible Agency: State
Scheduled Compliance Date: 11/26/1984		Actual Compliance Date: 12/14/1984	RTC Qualifier: OBSERVED	Sequence Number: 1
NRR Evaluation 07/06/1984	Activity Location: NJ	By: State	Identifier: 001	Person: Branch:
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: Found Violation: YES
Enforcement: Activity Location: NJ	Type: 120	Action Date: 11/09/1984	Identifier: 001	Branch:
Docket: Agency: State		Responsible Person: R2DEP	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:		Appeal Resolved:

Evaluations With No Violations:

FCI Evaluation 08/15/2001	Activity Location: NJ	By: State	Identifier: 001	Person: NORJA	Branch: N	Found Violation: NO
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area: V3

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: January 4, 2016 - 12:41 PM

Page 3

Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: January 4, 2016 - 12:41 PM

Page 4

Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
FCI	FOCUSED COMPLIANCE INSPECTION
NRR	NON-FINANCIAL RECORD REVIEW

Focus Area	Description
V3	CONVERTED FROM V2 RCRAINFO

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

* Note: Penalty amount may not reflect all violations cited.